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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

XIAO YE BAI,

Petitioner,

vs.

STATE OF NEVADA, *et al.*,

Respondent(s).

Case No. 2:20-cv-02042-KJD-NJK

**UNOPPOSED MOTION FOR
ENLARGEMENT OF TIME TO FILE
REPLY IN SUPPORT OF MOTION TO
DISMISS (ECF NO. 53)**

(SECOND REQUEST)

Respondents move this Court for an enlargement of time of 14 days from the current due date of February 28, 2022, up to and including March 14, 2022, in which to file their Reply in Support of the Motion to Dismiss (ECF No. 53). This Motion is made pursuant to Fed. R. Civ. P. 6(b) and Rule 6-1 of the Local Rules of Practice and is based upon the attached declaration of counsel. This is the second enlargement of time sought by Respondents, and the request is brought in good faith and not for the purpose of delay.

DATED: February 28, 2022.

Submitted by:

AARON D. FORD
Attorney General

By: /s/ Jaimie Stilz
Jaimie Stilz (Bar. No. 13772)
Deputy Attorney General

DECLARATION OF JAIMIE STILZ

STATE OF NEVADA)
) ss:
COUNTY OF CLARK)

I, JAIMIE STILZ, being first duly sworn under oath, depose and state as follows:

1. I am an attorney licensed to practice law in all courts within the State of Nevada, and am employed as a Deputy Attorney General in the Office of the Nevada Attorney General. I am assigned to represent Respondents in *Xiao Ye Bai v. State of Nevada, et al.*, Case No. 2:20-cv-02042-KJD-NJK, and as such, have personal knowledge of the matters contained herein.

2. This is my second request for an extension to file the Reply in Support of the Motion to Dismiss (ECF No. 53), and this Motion is made in good faith and not for the purpose of delay.

3. The Reply is currently due on February 28, 2022.

4. I am unable with due diligence to timely complete the Reply herein. I have been dealing with pressing medical/health issues and have recently had an unexpected death in my family. I have been diligently striving to resolve and/or work around these issues but they have significantly impacted my ability to complete the Reply in a timely fashion, thus necessitating an extension.

5. In seeking this extension, I am taking into consideration additional obligations and deadlines for both myself and my supervising senior colleague.

6. I have spoken to counsel for Bai, and he does not oppose this request.

7. Based on the foregoing, I respectfully request an enlargement of time of 14 days, up to and including March 14, 2022, to file the Reply in Support of the Motion to Dismiss (ECF No. 53).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 28th day of February, 2022.

/s/ Jaimie Stilz
Jaimie Stilz (Bar No. 13772)
Deputy Attorney General

IT IS SO ORDERED:


UNITED STATES DISTRICT JUDGE

Dated: March 1, 2022